



Thunder Basin Grasslands Prairie Ecosystem Association

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March 12, 2018

Bureau of Land Management
Casper Field Office
Attn: Mike Robinson, Project Manager
2987 Prospector Drive
Casper, WY 82604

RE: Converse County Oil and Gas Project Draft EIS comments

Dear Mr. Robinson,

Thunder Basin Grasslands Prairie Ecosystem Association appreciates the opportunity to provide comment on the proposed Converse County Oil and Gas Project Draft EIS (DEIS). The Association is a non-profit land-owner led organization which provides private landowner leadership in developing a responsible, science-based approach to long-term management of member's lands. The Association has developed an incentives-based conservation strategy in cooperation with the US Fish & Wildlife Service, BLM, USFS, and the Wyoming Game & Fish Department. The conservation strategy covers the five northeastern Wyoming counties, encompassing all of Converse County and the Thunder Basin National Grassland.

Cumulative Impacts and Capacity of Project Area

The Association has been working with agricultural producers and energy representatives for the past decade focusing on developing sustainable development and conservation strategies that also allow for agricultural production. We continue to be concerned about the level of projected industrial development and resulting loss of habitat necessary for both ag production and wildlife. Intact sage/grassland habitat is extremely limited in northeast Wyoming as the area transitions into the grasslands of the Great Plains. The preferred alternative estimates that approximately 76,700 acres of disturbance will occur in the project area as a result of the existing and planned oil and gas development.

We are very concerned with the conclusion found in the cumulative impacts assessment that indicates that ongoing and future well development will "cumulatively and incrementally reduce the ability of wildlife habitats to support wildlife and special status species at their current levels for the lifetime of the proposed project." This project, coupled with other industrial development (such as wind energy, other oil and gas projects, disposal facilities, scoria/aggregate mine pits, etc.), will reduce the project area's carrying capacity for all grazers (both domestic and wildlife) along with reducing habitat for raptors, songbirds, and other species of local concern. This loss of carrying capacity due to actual disturbance along with avoidance of high traffic and other

disturbed areas by grazers should be offset by a robust strategy including avoidance, minimization, and mitigation (where necessary).

Invasive Species Control

The Association is concerned about the spread of invasive species (such as cheatgrass, which is already prevalent throughout the project area) and other noxious weeds due to the proposed development. Cheatgrass, in particular, is extremely adaptive and thrives in disturbed areas. Not only does cheatgrass reduce production from desirable native grasses, it also increases fine fuel loading which increases the probability of more severe wildfires. Noxious weeds are also a concern, particularly along roads and pipeline rights-of-way. We encourage the BLM to work with the proponents to utilize existing best management practices (such as an aggressive herbicide control program) and develop additional methods to reduce the spread of invasive plants and noxious weeds.

Local Collaboration

Existing management objectives emphasize collaboration with local, state, federal and private entities. The Association has been working in partnership with the BLM in northeast Wyoming and the USFS in the Thunder Basin National Grassland for over a decade. While we recognize that the split estate situation in Converse County makes collaborative planning efforts difficult, we encourage both the BLM and the proponents to facilitate and actively pursue opportunities to involve the local community in site-specific planning discussions.

Preferred Alternative Comments

The BLM has selected Alternative B - the Proposed Action as the preferred alternative. We strongly support the utilization of surface disturbance measures whenever possible. In addition, we would encourage the BLM to consider including the following techniques from Alternative C along with other best management practices to help further reduce impacts and protect habitat and resources within the project area.

- Fugitive dust control - Both livestock and wildlife will avoid dust coated vegetation, increasing the impact of roads far beyond the road footprint. We support the operator proposed measures in Chapter 6.4.1 and encourage BLM and the proponents to consider additional means to reduce dust from project activities including minimizing truck traffic through best management practices such as piped vs. trucked water (both produced and frac supply).
- Light pollution - The proposed level of development will result in significant light pollution in the project area and we are concerned that impacts from light pollution may not have been adequately addressed. While human health and safety is of critical importance, we encourage the use of down- and focused-lighting wherever possible in order to minimize light pollution. In addition, flaring of gas should be minimized as much as possible.

- Noise abatement - Increase in noise and activity levels can have a detrimental impact on livestock and wildlife. In addition, although the project area is sparsely settled, impacts from noise on human habitation should be avoided or minimized whenever possible.
- Reducing well pad and ancillary facilities - We appreciate the efforts of BLM and the proponents to increase the number of wells per pad while decreasing the total number of well pads. In addition to these efforts, we would encourage co-location on existing well pads or other disturbances and would strongly encourage the individual proponents to engage in joint planning in order to minimize the disturbance from ancillary facilities such as roads and pipelines. We would also encourage the use of consolidated production facilities for both federal and non-federal minerals.
- Closed loop drilling - The Association supports the use of closed loop systems to the greatest extent possible and would encourage the BLM to incorporate this practice in the preferred alternative.
- Fire prevention - We encourage the proponents to work with the Converse County Rural Fire Department and implement best management practices to minimize the threat of fire. This could include such practices as avoiding siting burn stacks next to the downwind side of the well pad (any embers are immediately in vegetation) and developing and maintaining fire breaks where appropriate.
- Interim and Final Reclamation - While this is not possible in all areas due to split estate considerations, we strongly support the BLM (and USFS) efforts to apply interim and final reclamation standards where possible.

Thank you for the opportunity to provide comments on the Converse County Oil and Gas DEIS. We look forward to continuing to work with the BLM, USFS, the State, and other interested parties to support and participate in developing oil and gas resources while protecting those resources and habitats necessary for livestock production and wildlife.

Sincerely,

A handwritten signature in black ink, reading "Frank G. Eathorne, Jr." in a cursive script.

Frank G. Eathorne, Jr.
Chairman